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PLEASE REPLY TO NEW JERSEY OFFICE

May 27, 2011

*Via ECF and Ordinary Mail*

Re: **Request For Adjournment Of Motion**  
New Jersey Title Ins. Co. v. National Union Fire Ins. Co., et al.  
Civil Action No. 2:11-civ-630-DMC-JAD  
Our File No. 4543-11615

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SARAH J. HANLEY  
MEMBER OF NJ & NY BAR

Honorable Dennis M. Cavanaugh, U.S.D.J.  
United States District Court  
District of New Jersey  
Frank R. Lautenberg U.S.P.O.  
Courthouse Building, Room 451  
Federal Square, P.O. Box 999  
Newark, NJ 07101-0999

Dear Judge Cavanaugh:

We represent the Plaintiff, New Jersey Title Insurance Company, in the above referenced matter. Defendant, National Union Fire Insurance Company of Pittsburgh, has filed a motion to dismiss pursuant to Rule 12(b)(6), which is currently returnable June 20, 2011. National Union is represented by Richard Mills of McElroy, Deutsch, Mulvaney & Carpenter, LLP. The parties jointly request that the motion be adjourned and be made returnable July 18, 2011. Accordingly, Plaintiff's opposition will be due July 5, 2011, and Defendant's reply brief, if any, will be due July 11, 2011.

Thank you for Your Honor's consideration.

Respectfully submitted,

*Lisa J. Trembly*  
Lisa J. Trembly  
*Richard S. Mills*  
Richard S. Mills

LJT:mr

cc: Thomas J. Cahill, Esq. (via ECF)

SO ORDERED:

*Dennis M. Cavanaugh*  
DENNIS M. CAVANAUGH, U.S.D.J.